

Message

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**From:** Master, Barbora [Master.Barbora@epa.gov]  
**Sent:** 7/21/2021 3:08:15 PM  
**To:** Rugen, P. (Pamela) [pamela.rugen@nouryon.com]; Bauer, Jeff [Bauer.Jeff@epa.gov]  
**Subject:** RE: PMN Status Report

Hi Pam – There is nothing new to report on the status of your case, unfortunately.

Barbora Master  
Team Leader, Risk Management Branch 1  
New Chemicals Division  
U.S. Environmental Protection Agency  
202-343-9899

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**From:** Rugen, P. (Pamela) <pamela.rugen@nouryon.com>  
**Sent:** Wednesday, July 21, 2021 10:27 AM  
**To:** Bauer, Jeff <Bauer.Jeff@epa.gov>; Master, Barbora <Master.Barbora@epa.gov>  
**Subject:** FW: PMN Status Report

Hi Jeff/Barbora,  
I have a meeting with the business tomorrow and wondered if there is any movement on the human health report?  
Thank you in advance for your insight.  
Pam

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**From:** Rugen, P. (Pamela) <pamela.rugen@nouryon.com>  
**Sent:** Wednesday, July 7, 2021 10:59 AM  
**To:** Jeff Bauer <bauer.jeff@epa.gov>; master.barbora@epa.gov  
**Subject:** FW: PMN Status Report

Hi Jeff/Barbora,  
I hope this finds you both well after the holiday weekend. I have a meeting with the business tomorrow and wondered if there is any movement on the human health report?  
Thank you in advance for your insight.  
Pam

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**From:** Rugen, P. (Pamela) <pamela.rugen@nouryon.com>  
**Sent:** Monday, June 21, 2021 2:09 PM  
**To:** Bauer, Jeff <Bauer.Jeff@epa.gov>; master.barbora@epa.gov  
**Subject:** RE: PMN Status Report

Hi Jeff,  
Thanks so much. We are looking for some kind of timeline as you have been waiting for the Human Health report for at least 4 months. I don't quite understand what the holdup could be unless you are missing people from those positions. Please update me with any new information when this gets moving again as it seems like it is stuck in a holding pattern at EPA.  
Pam

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**From:** Bauer, Jeff <Bauer.Jeff@epa.gov>  
**Sent:** Monday, June 21, 2021 12:23 PM

**To:** Rugen, P. (Pamela) <pamela.rugen@nouryon.com>; Master, Barbora <Master.Barbora@epa.gov>

**Subject:** RE: PMN Status Report

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Pam, We are still waiting on the update Human Health report, As I mentioned there are going to be conditions in the Consent Order. The water trigger of 1 ppb, Hazard communication, no inhalation exposures, worker protection (impervious gloves). Once I get the Human health report I can finalize what will be proposed in the Consent Order. Since there were gen pop risk in the Original assessment ( and not sure if that has been mitigated) then we will explore if that needs to be addressed in the Consent Order as well. The water trigger of 1 ppb will address the drinking water and ground water and possibly the ground water risks. The fugitive air release with the information provided seems to address that issue and will be a topic of the next meeting after the Human Health report is done.

I have attached the boiler plate Consent Order for you to review. I did not check to see if you are the technical contact on other company PMNs. Review this boilerplate and reference the section mentioned above. There will be PUI testing but that is not required but only suggested. The Consent Order will be followed up with a 5(e) SNUR and that section would be applicable once the Consent Order is implemented.

The template for the Consent Order is also on our Web page.

New Chemicals Program - Boilerplates for Orders under section 5 of TSCA | Reviewing New Chemicals under the Toxic Substances Control Act (TSCA) | US EPA

Thanks

Jeff.

Jeff Bauer - Program Manager  
United States Environmental Protection Agency (USEPA)  
Office of Pollution Prevention and Toxics (OPPT)  
New Chemicals Program (7405M)  
<http://www.epa.gov/oppt/newchems/>

EPA East Building, room 4133M  
1201 Constitution Ave., NW  
Washington, DC 20004  
Phone: 202-564-9042, Fax: 202-564-9490

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**From:** Rugen, P. (Pamela) <pamela.rugen@nouryon.com>

**Sent:** Monday, June 21, 2021 12:28 PM

**To:** Bauer, Jeff <Bauer.Jeff@epa.gov>; Master, Barbora <Master.Barbora@epa.gov>

**Subject:** FW: PMN Status Report

Hello Jeff/Barbora,

Could you please give me an update as I need to inform this business if this is moving forward as they need to plan marketing for this product and are wondering when the EPA review will be finalized?

Thank you,

Pam

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**From:** Rugen, P. (Pamela) <pamela.rugen@nouryon.com>

**Sent:** Friday, June 11, 2021 11:56 AM

**To:** [bauer.jeff@epa.gov](mailto:bauer.jeff@epa.gov); [master.barbora@epa.gov](mailto:master.barbora@epa.gov)

**Cc:** Elsik, K. (Kristi) <Kristi.Elsik@nouryon.com>

**Subject:** FW: PMN Status Report

Hello Jeff/Barbora,

I am wondering if the Human Health report has been completed and if there is any possible timetable that you could give me concerning the completion of the EPA review process.

Thank you in advance and have a nice weekend.

Pam

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**From:** Rugen, P. (Pamela) <[pamela.rugen@nouryon.com](mailto:pamela.rugen@nouryon.com)>

**Sent:** Thursday, May 27, 2021 10:31 AM

**To:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>

**Cc:** [master.barbora@epa.gov](mailto:master.barbora@epa.gov)

**Subject:** RE: PMN Status Report

Hi Jeff/Barbora,

I hope this finds you both well. I recently attended a TSCA New Chemical Consortium and many members discussed that their PMNs are hung up on receiving a Human Health review. This seems to also be the case with this PMN. Do either of you have any insight when this report will be moving ahead as it has been months. There is absolutely no water release so I am curious why this would be in a Consent Order. Please elaborate if you can.

Thank you in advance for any awareness that either of you may have.

Pam

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**From:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>

**Sent:** Thursday, May 13, 2021 3:31 PM

**To:** Rugen, P. (Pamela) <[pamela.rugen@nouryon.com](mailto:pamela.rugen@nouryon.com)>; Master, Barbora <[Master.Barbora@epa.gov](mailto:Master.Barbora@epa.gov)>

**Cc:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>

**Subject:** RE: PMN Status Report

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Pam,

The engineering and exposure reports have been updated with the information you provided on March 1, 2021 in CDX. I am waiting on the Human Health report to see if we mitigated the general population risk from fugitive air releases during manufacturing which is not in line with the release you have in the PMN.

The reports no longer have water releases based on the new information and the Consent Order will have a water trigger of 1 ppb. The Consent Order will have worker protection section for impervious gloves. The Consent Order will have a Hazard communication section for several of the endpoints in the Human Health report (acute toxicity, skin irritation, serious eye damage, eye irritation, and Specific target organ toxicity). The proposed Consent Order will have language to not modify the manufacture, process or use operations that results in worker inhalation.

If the report reflects that the gen pop risk from fugitive air is mitigated then I can move forward with my report then writing the Consent Order. Once I get the report I can discuss the conditions considered for the Consent Order. I currently do not have a time frame for when the report will be completed.

I hope this summary helps you as to what we are waiting on and what the path forward.

Thanks

Jeff

Jeff Bauer - Program Manager

United States Environmental Protection Agency (USEPA)

Office of Pollution Prevention and Toxics (OPPT)

New Chemicals Program (7405M)  
<http://www.epa.gov/oppt/newchems/>

EPA East Building, room 4133M  
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**From:** Rugen, P. (Pamela) <[pamela.rugen@nouryon.com](mailto:pamela.rugen@nouryon.com)>  
**Sent:** Thursday, May 13, 2021 3:47 PM  
**To:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>; Master, Barbora <[Master.Barbora@epa.gov](mailto:Master.Barbora@epa.gov)>  
**Subject:** PMN Status Report

Hello Jeff/Barbora,  
Could you please give me an update on the PMN being reviewed by EPA?  
Thank you,  
Pam

**Pamela Rugen**  
Senior Product Regulatory Specialist  
Americas Product Safety & Regulatory Affairs  
Nouryon Chemicals

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**We've updated our brand color!**

As of May 2021, Nouryon's brand is blue, complementing our focus on science, innovation and sustainability.



**Nouryon**

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